

**TRIAL EXHIBIT FORM**

EXHIBIT (S) OF				
Defendants Joshua Kaul, Ismael Ozanne, Dawn Crim, Kenneth B. Simons, Timothy W. Westlake, Mary Jo Capodice, Alaa A. Abd-Elseyed, David A. Bryce, Michael Carton, Padmaja Doniparthi, Rodney A. Erickson, Bradley Kudick, Lee Ann R. Lau, David M. Roelke, Robert L. Zoeller, Peter J. Kallio, Pamela K. White, Rosemary Dolatowski, Jennifer Eklof, Elizabeth S. Houskamp, Sheryl A. Krause, Lillian Nolan, and Luann Skarlupka			<i>Planned Parenthood of Wisconsin, Inc., et al.</i>  v. Case No. 19-CV-38  <i>Joshua Kaul, et al.</i>	
Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
	501		Rule 26(a)(2) Rebuttal Report of Michael J. New, Ph.D., dated February 28, 2020, with Appendix A and Curriculum Vitae	
	502		Assumptions for Jane Collins expert report (Exhibit 3 to Jane Collins deposition on September 3, 2020), CO000000002 to CO000000004	
	503		Reported Induced Abortions in Wisconsin 2018, February 2020 Release, Wisconsin Department of Health Services (Exhibit 12 to Daniel Grossman deposition on August 25, 2020)	
	504		Joanna Venator & Jason Fletcher, <i>Undue Burden Beyond Texas: An Analysis of Abortion Clinic Closures, Births, and Abortions in Wisconsin</i> (October 2019) (Exhibit 2 to Jason Fletcher deposition on September 14, 2020)	
	505		Reported Induced Abortions in Wisconsin 2017, December 2018 Release, Wisconsin Department of Health Services (Exhibit 3 to Jason Fletcher deposition on September 14, 2020)	

Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
	506		Jason Fletcher expert report MS Excel native file (Exhibit 4 to Jason Fletcher deposition on September 14, 2020)	
	507		County FIPS Code Listing for the State of Wisconsin (Exhibit 5 to Jason Fletcher deposition on September 14, 2020)	
	508		Tracy A. Weitz, et al., <i>Safety of Aspiration Abortion Performed by Nurse Practitioners, Certified Nurse Midwives, and Physician Assistants Under a California Legal Waiver</i> , American Journal of Public Health (March 2013) (Exhibit 3 to Daniel Grossman deposition on August 25, 2020)	
	509		Mifepristone REMS, April 2019 (Exhibit 4 to Daniel Grossman deposition on August 25, 2020)	
	510		Abortion in Iowa City, IA (Exhibit 5 to Daniel Grossman deposition on August 25, 2020)	
	511		Abortion in Marquette, MI (Exhibit 6 to Daniel Grossman deposition on August 25, 2020)	
	512		Abortion in Rochester, MN (Exhibit 7 to Daniel Grossman deposition on August 25, 2020)	
	513		Abortion in Saint Paul, MN (Exhibit 8 to Daniel Grossman deposition on August 25, 2020)	
	514		Abortion in Waukegan, IL (Exhibit 9 to Daniel Grossman deposition on August 25, 2020)	

Date	Identification		Description	Offers, Objections, Rulings, Exceptions
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	515		Guttmacher Institute, Medication Abortion, dated November 1, 2019 (Exhibit 10 to Daniel Grossman deposition on August 25, 2020), GR0000514 to GR0000515	
	516		Rule 26(a)(2)(C) Disclosure of Kathy King, M.D., dated December 6, 2019, with Curriculum Vitae	
	517		Tracy A. Weitz, et al., Letters, <i>Research informs abortion care policy change in California</i> , American Journal of Public Health (Oct. 2014), KI0000309 to KI0000310	
	518		PDF Copy of Area Health Resource File SP0000227 (Exhibit 4 to Joanne Spetz deposition on August 25, 2020, reformatted)	
	519		PDF Copy of Data Explorer SP0000332 (Exhibit 5 to Joanne Spetz deposition on August 25, 2020, reformatted)	
	520		Guttmacher Institute, Medication Abortion, dated August 13, 2020, SP0000725 to SP0000729	
	521		Guttmacher Institute, Medication Abortion, dated November 9, 2020	
	522		Ying Xue, et al., <i>Impact of state nurse practitioner scope of practice regulation on health care delivery: Systematic review</i> , Nursing Outlook (2016), SP0002042 to SP0002056	
	523		Wisconsin Council on Medical Education & Workforce, 2018 Healthcare Workforce Report, <i>Mapping Our Way to Success: Wisconsin's Physician Workforce</i> , SP0001953 to SP0002004	

Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
	524		Wisconsin Hospital Association, Wisconsin 2018 Health Care Workforce Report, SP0002005 to SP0002040	
	525		Plaintiff Katherine Melde's Responses to Defendants' Requests for Documents and Interrogatories	
	526		Defendants' Notice of Rule 30(b)(6) Deposition of Plaintiff Planned Parenthood of Wisconsin, Inc. with Exhibit A, dated September 9, 2020 (Exhibit 1 to Planned Parenthood of Wisconsin, Inc. Rule 30(b)(6) deposition on September 21, 2020)	
	527		Plaintiff Planned Parenthood of Wisconsin, Inc.'s Responses to Defendants' Requests for Documents and Interrogatories, dated November 15, 2019 (Exhibit 2 to Planned Parenthood of Wisconsin, Inc. Rule 30(b)(6) deposition on September 21, 2020)	
	528		2020 Planned Parenthood monthly calendars (Exhibit 3 to Planned Parenthood of Wisconsin, Inc. Rule 30(b)(6) deposition on September 21, 2020), PPWI_00000931 to PPWI_00000945	<b>Plaintiffs designated this document "Highly Confidential" pursuant to the Protective Order in this case. If used at trial, Plaintiffs will request that this exhibit be sealed and/or that a redacted version be used.</b>
	529		Plaintiff Sara Beringer's Responses to Defendants' Requests for Documents and Interrogatories	
	530		Plaintiff Natalee Hartwig's Responses to Defendants' Requests for Documents and Interrogatories	

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In addition to the above exhibits, Defendants reserve the right to use as exhibits all publications cited or relied upon by Defendants' expert in his expert report filed in this case. Finally, Defendants reserve the right to produce rebuttal exhibits and impeachment exhibits at the trial in this matter.

Dated this 13th day of November 2020.

Respectfully submitted,

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Electronically signed by:

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